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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

PATSY JAY,

Petitioner,

v.

**GRAND MANAGEMENT SERVICES,
INC., EVERGREEN GARDENS
LIMITED PARTNERSHIP, JERRY
MASCOLO, LEONDRA COLEMAN,
and DAWN COCKRUM,**

Defendants.

Case No.: 3:23-cv-656-SI

**DECLARATION OF JAMIE
TRINKLE IN SUPPORT OF
PLAINTIFF'S RESPONSE TO
DEFENDANTS GRAND
MANAGEMENT SERVICES,
INC., JERRY MASCOLO,
LEONDRA COLEMAN, AND
DAWN COCKRUM'S MOTION
FOR SUMMARY JUDGMENT**

I, Jamie Trinkle, declare as follows:

1. I am an attorney representing the Plaintiff in this matter.

1 – DECLARATION OF JAMIE TRINKLE IN SUPPORT OF
PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT

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2. My co-counsel and I made repeated requests for: (1) any termination notice that was issued to John McKnight by Defendants after he sexually assaulted Plaintiff in July 2021, and (2) John McKnight's complete AppFolio record. To this date, Defendants have not provided the requested documents.
3. Attached to this Declaration and marked Exhibit 1 are excerpts from the deposition testimony of Plaintiff Patsy Jay on August 16, 2024. The transcript certification page signed by Certified Court Reporter Kim Nerheim on August 26, 2024 is included.
4. Attached to this Declaration and marked Exhibit 2 are excerpts from the deposition testimony of Defendant Grand Management Services, Inc.'s owner Kristin Smith on July 18, 2024. The transcript certification page signed by Certified Court Reporter Valerie Barna on August 7, 2024 is included.
5. Attached to this Declaration and marked Exhibit 3 are true and correct copies of John McKnight's AppFolio records in the format in which they were provided by Defendants during discovery. Defendants marked these documents "Confidential" or "Attorney's Eyes Only" pursuant to the Stipulated Protective Order entered April 17, 2024 (ECF 20). For that reason, Exhibit 3 is authorized to be filed under seal.
6. Attached to this Declaration and marked Exhibit 4 are excerpts from the deposition testimony of Defendant Leondra Coleman on July 19, 2024. The transcript certification page signed by Certified Court Reporter Rowan Folske on August 5, 2024 is included.
7. Attached to this Declaration and marked Exhibit 5 is a true and correct copy of Tillamook Police records in response to a public records request I submitted to Tillamook County Emergency Communications District on August 11, 2022. Defendants also provided a

version of these public records to Plaintiff in discovery (GMS 1421-27) but marked them “Confidential.”

8. Attached to this Declaration and marked Exhibit 6 are excerpts from the deposition testimony of Defendant Jerry Mascolo on July 29, 2024. The transcript certification page signed by Certified Court Reporter Ryan Batterson on August 15, 2024, is included.
9. Attached to this Declaration and marked Exhibit 7 is the lease for John McKnight provided by Defendants. Defendants marked these documents “Confidential” pursuant to the Stipulated Protective Order entered April 17, 2024 (ECF 20). For that reason, Exhibit 7 is authorized to be filed under seal.
10. Attached to this Declaration and marked Exhibit 8 is an email from Cindy Fargher provided by Defendants. Defendants marked these documents “Confidential” pursuant to the Stipulated Protective Order entered April 17, 2024 (ECF 20). For that reason, Exhibit 8 is authorized to be filed under seal.
11. Attached to this Declaration and marked Exhibit 9 is a true and correct copy of the Petition and Temporary Order entered in Tillamook County Circuit Court case 18SK02127, *Temera L Porter vs John McKnight*.
12. Attached to this Declaration and marked Exhibit 10 is an eviction notice issued to Temera Porter provided by Defendants. Defendants marked these documents “Attorney’s Eyes Only” pursuant to the Stipulated Protective Order entered April 17, 2024 (ECF 20). For that reason, Exhibit 10 is authorized to be filed under seal.
13. Attached to this Declaration and marked Exhibit 11 is a true and correct copy of the Petition for Restraining Order to Prevent Abuse and Restraining Order entered in Tillamook County Circuit Court case 19PO02348, *Cindy Fargher v. John McKnight*.

14. Attached to this Declaration and marked Exhibit 12 are an eviction and cure notice issued to John McKnight provided by Defendants. Defendants marked these documents “Confidential” pursuant to the Stipulated Protective Order entered April 17, 2024 (ECF 20). For that reason, Exhibit 12 is authorized to be filed under seal. This is the only lease violation notice that Defendants have provided to Plaintiff.
15. Attached to this Declaration and marked Exhibit 13 are excerpts from the deposition testimony of Defendant Dawn Cockrum on July 29, 2024. The transcript certification page signed by Certified Court Reporter Ryan Batterson on August 15, 2024 is included.
16. Attached to this Declaration and marked Exhibit 14 is a true and correct copy of a reasonable accommodation request that Plaintiff submitted to Defendants and Defendants’ work order related to that request. These documents were provided by Defendants in discovery.
17. Attached to this Declaration and marked Exhibit 15 is a true and correct copy of Plaintiff’s 2019 lease and move-in checklist. These documents were provided by Defendants in discovery.
18. Attached to this Declaration and marked Exhibit 16 is a true and correct copy of Plaintiff’s 2021 lease. These documents were provided by Defendants in discovery. In Defendants’ Motion for Summary Judgment, Defendants only attached the last 13 pages of Plaintiff’s 2021 lease as Exhibit K (ECF 28-11).
19. Attached to this Declaration and marked Exhibit 17 is a true and correct copy of an email from Cindy Fargher to Defendant GMS. This document was provided by Defendants in discovery. Defendants marked this document “Confidential” pursuant to the Stipulated

Protective Order entered April 17, 2024 (ECF 20). For that reason, Exhibit 17 is authorized to be filed under seal.

20. Attached to this Declaration and marked Exhibit 18 is a true and correct copy of an email from Defendant Leondra Coleman to Defendants GMS and Jerry Mascolo. This document was provided by Defendants in discovery. Defendants marked this document “Confidential” pursuant to the Stipulated Protective Order entered April 17, 2024 (ECF 20). For that reason, Exhibit 18 is authorized to be filed under seal.

21. Attached to this Declaration and marked Exhibit 19 is a true and correct copy of a notice issued to Plaintiff by Defendants. This copy of the document was provided by Defendants in discovery.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Dated this 17th day of December 2024.

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/s/ Jamie Trinkle
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Of Attorneys for Plaintiff Patsy Jay